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*Attorneys for Defendant United States*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

Joseph O'Shaughnessy, *et al.*,  
Plaintiffs,  
  
v.  
  
United States of America, *et al.*,  
  
Defendants.

No. 2:22-cv-01039-APG-DJA

**UNOPPOSED MOTION TO EXTEND  
TIME TO FILE RESPONSIVE  
PLEADING  
(FIRST REQUESTED EXTENSION)**

Defendant United States of America hereby moves pursuant to Federal Rule of Civil Procedure 6(b)(1) and Local Rule LR IA 6-1, for a 60-day extension of time to November 4, 2022, to file a responsive pleading to Plaintiff's Complaint (Doc. 1).

This is Defendants' first requested extension of time in this matter.

Counsel for United States has an unusually heavy workload with a high number of filings due to be completed in the next three weeks, and has a trial scheduled to begin on September 12, 2022, followed by a long-scheduled vacation starting on September 26, 2022. Furthermore, the responsive pleading in this matter requires review and comment by counsel for multiple federal agencies before filing. The case styled *Todd C. Engel v. United States of America*, 2:22-cv-01040-JCM-NJK concerns many of the same events and the same attorneys as the above captioned case and was filed the same day. An identical

1 unopposed motion to extend has been filed in the *Engel* case.

2       Undersigned counsel Heathcotte affirms that Plaintiff's counsel Marquiz consents  
3 to the granting of this motion.

4       For the foregoing reasons, Defendant respectfully requests that the deadline to file  
5 a responsive pleading to the Complaint be extended to November 4, 2022.

6       RESPECTFULLY SUBMITTED this August 22, 2022.

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8                   MERRICK GARLAND  
                  United States Attorney General

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10                   s/ Brock Heathcotte  
                  BROCK HEATHCOTTE  
                  Special Assistant United States Attorney, Acting  
                  Under Authority Conferred by 28 U.S.C. § 515  
                  Attorneys for Defendant United States

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20                   IT IS SO ORDERED:

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22                   UNITED STATES DISTRICT JUDGE

23                   DATED: \_\_\_\_\_  
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**CERTIFICATE OF SERVICE**

I hereby certify that on August 22, 2022, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to all CM/ECF registrants.

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LEAD ATTORNEY  
ATTORNEY TO BE NOTICED

s/ Irene Millsaps  
United States Attorney's Office